

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT DEDMON,
Plaintiff

v.

**SHELL EXPLORATION &
PRODUCTION COMPANY AND
SHELL TRADING SERVICES
COMPANY,**
Defendants

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CIVIL ACTION NO.
4:21-cv-03371

JURY DEMANDED

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE
TO EXCEED WORD LIMIT FOR MOTIONS FOR
SUMMARY JUDGMENT, RESPONSES AND REPLIES**

Defendants Shell Exploration & Production Company and Shell Trading Services Company (hereinafter "Defendants"), file this Unopposed Motion for Leave to Exceed Word Limit for Motions for Summary Judgment, Responses and Replies, and respectfully state as follows:

1. This is an employment discrimination lawsuit. Plaintiff asserts multiple claims under Title VII and Section 1981 for race and color discrimination, including for alleged pay discrimination and alleged failure to promote. While some of the facts, legal standards and arguments on Plaintiff's claims overlap, some claims involve different facts, legal standards and arguments that the Parties must address.

2. In order to fully address the multiple issues presented in this case, Defendant anticipates that the Parties will need to exceed the 5000-word limit for motions for

summary judgment and responses, and the 2000-word limit for replies. For example, although Defendants believe their motion is succinct and efficient, it anticipates that the motion will be approximately 8,500 words (approximately 28 pages), excluding the case caption, tables, signature block and certificates. Defendants anticipate that any motions and responses Plaintiff files will be similar in terms of overall word count. Additionally, although Defendants will be brief and to the point in any replies they file, they anticipate that they will exceed the current 2000-word limit and will need to file a reply that is approximately 3,500 words, excluding the case caption, tables, signature block and certificates.

3. Accordingly, Defendants respectfully request that the Court extend the word limits and grant the Parties leave to file motions for summary judgment and responses that do not exceed 8,500 words and replies that do not exceed 3,500 words.

4. The Parties have conferred and Plaintiff is not opposed to this request, which is made so that justice may be done and not to burden the Court.

Respectfully submitted,

/s/ Marlene C. Williams

Marlene C. Williams

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I hereby certify that on September 24, 2024, I conferred with Plaintiff's counsel regarding this Motion and they confirmed that Plaintiff is unopposed.

/s/ Marlene C. Williams

Marlene C. Williams

CERTIFICATE OF SERVICE

I hereby certify that September 24, 2024, I electronically submitted the foregoing document with the clerk of the court for the U.S. District Court, Southern District of Texas – Houston Division, using the electronic case files system of the court. The electronic case files system sent a “Notice of Electronic Filing” to the following CM/ECF participants:

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/s/ Marlene C. Williams

Marlene C. Williams